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August 7, 2023

VIA ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Wentworth Rattray v. Police Officer Cadavid, et al.,
17-CV-8560 (PGG)(KHP) – Letter Motion to Seal**

Dear Judge Gardephe:

We represent Plaintiff Wentworth Rattray. In connection with the Joint Pre-Trial Order filed with the Court on August 4, 2023 by Plaintiff Wentworth Rattray (“Plaintiff”), Plaintiff respectfully requests leave to submit redacted versions of certain exhibits listed on the Joint Pre-Trial Order and to file certain exhibits to the Pre-Trial Order under seal pursuant to Fed. R. Civ. Proc. 5.2 and Rule II.A of the Individual Rules of Practice of Paul G. Gardephe for civil cases. Specifically, Plaintiff seeks leave to submit a redacted and/or fully sealed version of the following exhibits:

Plaintiff’s Exhibit 1: October 5, 2016 Family Court Order of the Hon. J. Machele Sweeting in the proceeding, Sandy Wendy v. Wentworth Rattray, Docket # V-31854-16, V-36024-16, including name of minor child.

Plaintiff’s Exhibit 3: November 7, 2016 Family Court Order of the Hon. J. Machele Sweeting in the proceeding, Sandy Wendy v. Wentworth Rattray, Docket # V-31854-16, V-36024-16, including name of minor child.

Plaintiff’s Exhibit 5: November 5, 2016 and November 6, 2016 email exchange from Gary Rattray to Court Attorney to the Hon. J. Machele Sweeting and advocacy organization, including name of minor child.

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Honorable Paul G. Gardephe
August 7, 2023
Page 2

Plaintiff's Exhibit 6: New York City Police Department Domestic Incident Report of November 5, 2016 occurrence, including name of minor child and confidential personal information of individuals including date of birth.

Plaintiff's Exhibit 7: Handwritten New York State Domestic Incident Report including name of minor child and confidential personal information of individuals including date of birth.

Plaintiff's Exhibit 8: Event Chronology with officer notes, including confidential personal information of individuals including date of birth.

Plaintiff's Exhibit 9: August 10, 2021 Plaintiff's medical records from the Department of Veteran Affairs.

Plaintiff's Exhibit 10-16: Plaintiff's financial information from the Internal Revenue Service including W-2 and tax statement for the years 2015-2020.

The above exhibits all include or discuss sensitive information as defined by Fed. R. of Civ. Proc. 5.2 and/or under Your Honor's Individual Rules. Accordingly, Plaintiff requests leave to file the aforementioned exhibits under seal.

Very truly yours,

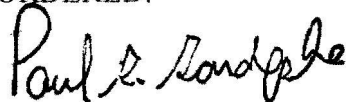
/s/ Melissa S. Geller

Melissa S. Geller

Cc: All counsel of record (via ECF)

MEMO ENDORSED: Plaintiff's motion for leave to submit certain trial exhibits redacted and under seal (Dkt. No. 259) is granted.

SO ORDERED.



Paul G. Gardephe
United States District Judge

Date: August 11, 2023